

**STATE OF NEW MEXICO
BEFORE THE SECRETARY OF ENVIRONMENT**

**NEW MEXICO ENVIRONMENT
DEPARTMENT,
Complainant,**

v.

No. SWB 20-001 (CO)

BL SANTA FE, LLC,

and

**HRV HOTEL PARTNERS, LLC,
Respondents.**

NOTICE REGARDING REPRESENTATION

Pursuant to the Scheduling Order entered on November 5, 2021, counsel for Respondent provides the following information relative to continued representation. On November 11, 2021, undersigned counsel was informed that Juniper BL HoldCo, LLC, a subsidiary of Juniper Investment Advisors, LLC, became the sole owner of BL Santa Fe, LLC, as a result of a restructuring plan approved by the Delaware Bankruptcy Court, effective on October 29, 2021. Upon information and belief, HRV Hotel Partners, LLC, is no longer the real party in interest in this proceeding based on the transfer of control over Respondent BL Santa Fe, LLC to Juniper BL HoldCo, LLC.

Undersigned counsel has not discussed substantively any continued representation of Juniper BL HoldCo, LLC, or BL Santa Fe, LLC. However, the undersigned counsel has determined that, under our Rules of Professional Conduct, he must withdraw from any representation in this matter due to an actual or potential conflict of interest between the current and former controlling members of Respondent BL Santa Fe, LLC. *See* Rule 16-109 NMRA. Counsel will file a notice of withdrawal with the hearing clerk.

HINKLE SHANOR LLP

/s/ Thomas M. Hnasko

Thomas M. Hnasko

Julie A. Sakura

P.O. Box 2068

Santa Fe, NM 87504-2068

(505) 982-4554

thnasko@hinklelawfirm.com

jsakura@hinklelawfirm.com

*Attorneys for Respondents BL Santa Fe, LLC
And HRV Hotel Partners, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of November, 2021, a copy of the foregoing Notice Regarding Representation was served via email to the following:

Christopher Atencio
Assistant General Counsel
Legislative & Policy Legal Analyst
New Mexico Environment Department
Office of General Counsel
121 Tijeras Avenue NE
Albuquerque, NM 87102
christopher.atencio@state.nm.us

/s/ Thomas M. Hnasko

Thomas M. Hnasko